

THE UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND

MARK AHLQUIST, as next friend, parent and  
guardian of J.A., a minor

Plaintiff,

v.

CITY OF CRANSTON, by and through Robert F. Strom,  
in his capacity as Director of Finance, and by and through  
the School Committee of the City of Cranston, and  
SCHOOL COMMITTEE OF THE CITY OF CRANSTON,  
by and through Andrea Iannazzi, in her capacity as Chair  
of the School Committee of the City of Cranston,  
Defendants.

C.A. No. 11-138-L

**STIPULATION**

Plaintiff Mark Ahlquist and Defendants City of Cranston and School Committee of the  
City of Cranston hereby agree and stipulate as follows:

- (a) The parties hereby waive their right to a trial by jury;
- (b) Pursuant to Fed. R. Civ. P. 65, the Court may advance the trial on the merits and consolidate it with the hearing on Plaintiff's Motion for Preliminary Injunction;
- (c) The hearing shall be held on October 5, 2011 at 2:00 p.m.; in lieu of live testimony, the parties will present as evidence deposition transcripts, affidavits and pre-numbered exhibits;
- (d) The parties shall each file a Memorandum of Law on or before September 2, 2011;
- (e) The parties may each file a reply Memorandum of Law on or before September 16, 2011;
- (f) In the event of a liability finding against either or both Defendants, the Court shall determine to what extent equitable and/or declaratory relief may be warranted and each party reserves the right to argue his or its position thereon. In addition to any equitable or declaratory

relief which the Court may award, the parties agree that Plaintiff shall be awarded compensatory damages in the amount of \$25.00.

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